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**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
HERNAN CHAVEZ-TORRES,)
)
Defendant.)
)
_____)

Case No.: 2:23-mj-00212-BNW

STIPULATION TO CLOSE CASE

IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON, United States Attorney, and IMANI DIXON, Assistant United States Attorney, counsel for the United States of America, and JASON BARRUS, counsel for the defendant HERNAN CHAVEZ-TORRES, that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

1. On or about May 25, 2023, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to the amended Count One of the Complaint, Reckless Driving, in violation of 36 C.F.R. § 4.2 and NRS 484B.653. *See* ECF No. 8.

2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$500 fine and a

1 mandatory \$10 penalty assessment; and (ii) attend and complete the Lower Court
2 Counseling's (1) DUI course and (2) Victim Impact Panel.

3 3. On May 25, 2023, this Court sentenced defendant pursuant to the parties' plea
4 agreement. *See* ECF No. 8.

5 4. Since commencing his term of unsupervised probation, defendant has
6 successfully completed conditions (i) and (ii).

7 5. As such, the parties jointly request that the above-captioned matter be closed.
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10 DATED this 27th day of November, 2023.

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12 Respectfully submitted,
13 JASON M. FRIERSON
14 United States Attorney

15 /s/ Jason Barrus
16 JASON BARRUS, ESQ.
17 Attorney for Defendant
18 **HERNAN CHAVEZ-TORRES**

19 /s/ Imani Dixon
20 IMANI L. DIXON, ESQ.
21 Assistant United States Attorney
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ORDER TO CLOSE THE CASE

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant Hernan Chavez-Torres has successfully completed the conditions of his sentencing.

ORDER

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 28th day of November, 2023


UNITED STATES MAGISTRATE JUDGE